

Anti-Bribery and Corruption Policy

At Hill-Tec Ltd, we are committed to conducting our business with the highest standards of integrity, transparency, and ethical behavior. Our Anti-Bribery and Corruption Policy reflects our dedication to maintaining a culture of honesty, fairness, and compliance with all applicable laws and regulations. This policy applies to all employees, contractors, agents, and any other individuals acting on behalf of Hill-Tec Ltd.

Policy Statement:

Integrity: Hill-Tec Ltd upholds the principle of integrity in all business activities. We prohibit any form of bribery, corruption, or unethical conduct. We expect all employees to act honestly, ethically, and in accordance with the law.

Communication and Engagement: We foster open and transparent communication throughout our organization. We encourage employees to report any concerns or suspicions of bribery or corruption promptly. We provide appropriate channels for reporting such issues and ensure confidentiality and protection for whistleblowers.

Policy Guidelines:

Prohibition of Bribery and Corruption:

Hill-Tec Ltd strictly prohibits the offering, giving, solicitation, or acceptance of bribes or corrupt payments, whether directly or indirectly.

Employees must not engage in any activity that could lead to bribery, corruption, or unethical behavior.

Compliance with Laws and Regulations:

Employees must comply with all applicable anti-bribery and corruption laws, including but not limited to the Bribery Act 2010.

Employees must be aware of and adhere to the specific laws and regulations relevant to their roles and responsibilities.

Gifts, Hospitality, and Donations:

Employees must exercise caution when giving or receiving gifts, hospitality, or donations. These should be modest, appropriate, and within the scope of customary business practices, without the intention to influence or gain unfair advantage.

All gifts, hospitality, or donations above a predetermined threshold must be recorded and reported as per the company's procedures.



Third-Party Due Diligence:

Hill-Tec Ltd conducts thorough due diligence on third parties, such as suppliers, contractors, agents, and business partners, to ensure their integrity and compliance with anti-bribery and corruption standards.

Employees must not engage or continue relationships with any third party known or suspected to be involved in bribery or corruption.

Training and Awareness:

Hill-Tec Ltd provides regular training and awareness programs to employees, ensuring they understand the risks associated with bribery and corruption.

Employees will receive guidance on identifying and reporting potential instances of bribery or corruption.

Reporting and Investigation:

Employees must promptly report any suspected or actual bribery or corruption to their line manager, the Compliance Officer, or through the designated reporting channels.

All reports will be thoroughly and impartially investigated, and appropriate action will be taken in line with the company's disciplinary procedures and applicable laws.

Non-Retaliation:

Hill-Tec Ltd prohibits any form of retaliation against individuals who, in good faith, report concerns or assist in investigations related to bribery or corruption.

Compliance with this policy is mandatory for all individuals associated with Hill-Tec Ltd. Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment or contract.

We are committed to continuously reviewing and updating our Anti-Bribery and Corruption Policy to ensure its effectiveness in combating bribery and corruption and upholding our core values of integrity, communication, and engagement.

Director Name

Duncan MacPherson

